

## State Water Resources Control Board

September 11, 2015

Rich Development  
Attention: Mr. Joseph W. Rich  
1000 North Western Avenue, #200  
San Pedro, CA 90732

Dear Mr. Rich:

CLOSURE DENIAL REVIEW FOR PETROLEUM UNDERGROUND STORAGE TANK CASE,  
EAST GAFFEY RETAIL CENTER, 640-650 GAFFEY STREET, SAN PEDRO, LOS ANGELES  
COUNTY

State Water Resources Control Board (State Water Board) Resolution No. 2012-0062 requires that State Water Board staff review a lead agency's decision when the lead agency has denied a request by a responsible party for an underground storage tank (UST) case closure pursuant to the Low-Threat UST Case Closure Policy (Policy).

The subject case has the following identification numbers:

- State Water Board, GeoTracker No. T0603752984
- Los Angeles Regional Water Quality Control Board (Los Angeles Water Board), Case No. 907310489

State Water Board staff reviewed the closure request dated March 25, 2015 and the response from the Los Angeles Water Board. After careful consideration of the GeoTracker record, State Water Board staff agrees with the Los Angeles Water Board staff determination that all of the Policy criteria have not been met. Based on information in the above-referenced GeoTracker record, this agency finds that the subject site does not meet the following Policy criteria:

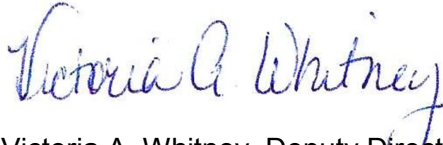
- General Criterion e – A conceptual site model that assesses the nature, extent, and mobility of the release has been developed; or
- The plume is not delineated.

The local geology and hydrology are not described and the contaminant transport and fate within the environment are not identified.

Petroleum constituents in groundwater continue to pose a threat to human health, safety, and the environment. Criteria for low-threat UST case closure have not been met at this time, therefore closure of the UST case is not appropriate.

If you have any questions, please contact George Lockwood at (916) 341-5752 or [George.Lockwood@waterboards.ca.gov](mailto:George.Lockwood@waterboards.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Victoria A. Whitney". The signature is written in a cursive, flowing style.

Victoria A. Whitney, Deputy Director  
Division of Water Quality

cc: [Via email only]

Mr. Samuel Unger, Executive Officer, Los Angeles Water Board  
([Samuel.Unger@waterboards.ca.gov](mailto:Samuel.Unger@waterboards.ca.gov))

Mr. Yi Lu, Los Angeles Water Board  
([Yi.Lu@waterboards.ca.gov](mailto:Yi.Lu@waterboards.ca.gov))

Mr. Arman Toumari, Los Angeles Water Board  
([Arman.Toumari@waterboards.ca.gov](mailto:Arman.Toumari@waterboards.ca.gov))

Ms. Frances McChesney, State Water Board  
([Frances.McChesney@waterboards.ca.gov](mailto:Frances.McChesney@waterboards.ca.gov))

Ms. Jennifer Fordyce, State Water Board  
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Mr. David Coupe, State Water Board  
([David.Coupe@waterboards.ca.gov](mailto:David.Coupe@waterboards.ca.gov))

Mr. Steven Westhoff, State Water Board  
([Steven.Westhoff@waterboards.ca.gov](mailto:Steven.Westhoff@waterboards.ca.gov))

Mr. George Lockwood, State Water Board  
([George.Lockwood@waterboards.ca.gov](mailto:George.Lockwood@waterboards.ca.gov))

Mr. Eric D. Floyd, Wayne Perry, Inc.  
([EFloyd@wpinc.com](mailto:EFloyd@wpinc.com))